

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CASE NUMBER:**

Dominique B. Lovejoy,

Plaintiff,

v.

Jason L. Richardson, Rocket Expediting, LLC,
Super Ego Holdings, LLC, Super Ego
Logistics, LLC, Stefan Perovic, and Sendmee
Trucking, LLC,

Defendants.

3:23-cv-05393-MGL

NOTICE OF REMOVAL

TO: THE UNITED STATES DISTRICT COURT:

Now Come Defendants Jason L. Richardson, Rocket Expediting, LLC, Super Ego Holdings, LLC, Super Ego Logistics, LLC, Stefan Perovic, and Sendmee Trucking, LLC, and hereby remove this civil action to the United States District Court for the District of South Carolina pursuant to 28 U.S.C. 1441(a), and in support thereof states:

1. This is a civil action in which the Plaintiff is seeking to recover insurance coverage for damages allegedly suffered as a result of an accident on or about April 10, 2023, in Richland County.

2. The Plaintiff filed suit on October 4, 2023, in the Court of Common Pleas, Richland County, South Carolina, which is within the Columbia Division of this Court. 28 U.S.C. § 121 (3). The Plaintiff's original Complaint is attached to this Notice. (**Exhibit A:** Complaint).

3. In her Complaint, Plaintiff alleges that she is a resident of South Carolina. (¶ 1).

4. Defendants Rocket Expediting LLC is a business primarily located in Franklin County, Ohio. Defendant Sendmee Trucking, LLC is a business primarily located in Walker,

County, Alabama, and Defendant Jason Lee Richardson is a resident of Walker County, Alabama. Defendants Super Ego Holdings, LLC, and Super Ego Logistics, LLC, are businesses primarily located in the State of Illinois.

5. Certain actions brought in state court may be removed to Federal Court pursuant to 28 U.S.C § 1441 (a). The procedure for removal to Federal Court is governed by 28 U.S.C. § 1446.

6. There is complete diversity of citizenship between the Plaintiff and Defendants. Plaintiff is a citizen of the State of South Carolina, and the Defendants are citizens of the States of Alabama, Ohio, and Illinois.

7. The Plaintiff's Complaint does not state a specific amount of damages being sought. The Complaint is silent as to whether the amount in controversy is satisfied. However, the Plaintiff seeks damages for actual (including extensive and expensive medical treatment and lost wages) and punitive damages. (Complaint, ¶ 15, 16, 20, 25, and Prayer). As such, the amount in controversy is satisfied. *See Woodward v. Newcourt Commercial Finance Corp.*, 60 F. Supp. 2d 530 (D.S.C. 1999).

7. Moreover, this case is removed within 30 days of the Defendants receiving written notice of the Plaintiff's Complaint.

8. Pursuant to the provisions of 28 U.S.C. § 1446 (a), Defendants are not aware of any other process and pleadings served by them or to them in the state court action.

9. The Defendants will provide notice of this removal to the Clerk of Court of the Richland County Court of Common Pleas and shall request an Acknowledgement from the Clerk and, upon receipt, will file it with this Court.

WHEREFORE, Defendants respectfully file this Notice of Removal so that this case may proceed in the United States District Court, District of South Carolina, Columbia Division, and that no further proceedings be held in said case in the Court of Common Pleas, County of Richland, State of South Carolina, and for such other further relief as the Court deems just and proper in the circumstances.

MURPHY & GRANTLAND, P.A.

s/Crawford A. Krebs

John M. Grantland, Esquire (Fed. ID#06462)

Crawford A. Krebs, Esquire (Fed. ID#13963)

Post Office Box 6648

Columbia, South Carolina 29260

Phone: (803) 782-4100

Fax: (803) 782-4140

Email: jgrantland@murphygrantland.com

Email: ckrebs@murphygrantland.com

Attorneys for Defendants

Columbia, South Carolina
October 26, 2023